

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Consider the)
Adoption of a General Order and Procedures to)
Implement the Digital Infrastructure and Video) Rulemaking 06-10-005
Competition Act of 2006.)

**OPENING COMMENTS OF VERIZON¹ ON ISSUES SET FORTH IN
PHASE II SCOPING MEMO DATED MAY 7, 2007**

Verizon respectfully submits these opening comments in response to the May 7, 2007 Scoping Memo setting forth the proposed scope for issues deferred from Phase I of this proceeding implementing the provisions of the Digital Infrastructure and Video Competition Act of 2006 (DIVCA). Verizon concurs with the scope of Phase II of this proceeding as discussed in the Scoping Memo, and addresses the issues identified in the order mentioned there.

I. Build-Out Requirements

Verizon has no comments on this issue, which pertains to state video franchise holders with fewer than one million California telephone customers, but will address this issue in reply as needed.

II. Broadband and Video Access and Adoption Information

The Scoping Memo asks whether “additional, more detailed” broadband and video information is needed to enforce certain provisions of DIVCA. Those provisions include the legislative intent that DIVCA implementation “(i) promote widespread access to technologically advanced cable and video services, and (ii)

¹ These comments are submitted on behalf of Verizon California Inc. in its capacity as holder of California Video Franchise Certificate Number 0001 dated March 8, 2007.

complement efforts to increase investment in broadband infrastructure and close the digital divide,”² and that franchise holders demonstrate “substantial and continuous effort” to meet build requirements.³ The answer is no: further information is not needed to enforce those provisions.

A. DIVCA and D.07-03-014 Already Require Extensive Reporting Tailored to the Concerns Raised in the Scoping Memo

The focus on broadband deployment and infrastructure development identified in the Scoping Memo requires no additional information for implementation or enforcement. DIVCA itself already mandates widespread deployment of video service by requiring that state franchise holders Verizon and AT&T offer video service to specified percentages of their telephone customers at intervals of two, three and five years.⁴ DIVCA further mandates three- and five-year percentage targets for low-income penetration, as well as numerical targets for free service to community centers in underserved areas.⁵ Extension of any of these deadlines must be approved by the Commission and supported by a showing of “substantial and continuous effort” to meet the requirements at issue. Nothing will be gained by requiring additional information from franchise holders; rather, these provisions will be enforced by a review of their actions.⁶

² Scoping Memo at 4, citing Pub. Util. Code §5810(a)(2)(B) and (E).

³ Scoping Memo at 5, citing Pub. Util. Code §5890(f)(4).

⁴ §5890(e)(1)-(3) mandate that fiber-to-the-premises video be offered to 25% of households within 2 years, and to 40% within 5 years (if a certain market penetration is reached); other video service technology must be offered to 35% of households within 3 years, and to 50% within 5 years (if market penetration is met).

⁵ §5890(b) (1), (2), and (3).

⁶ D.07-03-014 at 229 (implementation strategy based on “action” of franchise holders, not “pre-entry” reviews), and Finding of Fact 54 at 246 (monitoring “actions” through reporting requirements will enable Commission to assess compliance with build-out and antidiscrimination requirements).

Moreover, these statutory requirements are already fully supported by substantial and continuing reporting requirements.⁷ DIVCA as adopted requires detailed reporting of broadband and video deployment beginning in 2008, and continuing annually.⁸ The Commission in D.07-03-014 considerably expanded this reporting in several ways, including moving it up a year, to further its implementation of DIVCA.⁹ Together, these requirements are extremely detailed as illustrated below:

1. DIVCA annual reporting requirements include, by census tract:

- The number of households to which the holder makes broadband available in the state.
- The number of households that subscribe to broadband in the state.
- The technology used to provide broadband
- The number of households in the telephone service area (if the holder is a telephone corporation)
- The number of households in the holder's telephone service area that are offered video service by the holder. (if the holder is a telephone corporation)
- The number of low-income households in the holder's video service area
- The number of low-income households in the holder's video service area that are offered video service by the holder.

2. D.07-03-014 additional reporting requirements include, by census tract:

- Non-Wireline Broadband availability, by type of technology used
- Non-Wireline Broadband subscribers

3. In addition to the annual reporting requirements identified above, the video application requires certain baseline information reported at a census tract level, including:

⁷ The Commission expressly acknowledged that the annual broadband and video reporting requirements fulfill a number of statutory purposes, including efforts to close the digital divide and increase broadband adoption. D.07-03-014 at 141 ("possessing broadband and video data will enable us to support a variety of voluntary efforts to increase broadband adoption").

⁸ §5960(b)(1)(broadband information) and (b)(2)(video information).

⁹ For example, in implementing DIVCA, the Commission required substantial broadband and video deployment information to be submitted 90 days after issuance of a state franchise; extended reporting obligations to all broadband affiliates (including wireless affiliates) of a franchise holder; and required reports on provision of free service to community centers.

- The number of low-income households in the telephone and video service areas.
- The number of low-income households in the telephone and video service areas that are offered video service.
- Non-wireline broadband availability and subscribership in the telephone and video service areas.

The Commission should adhere to its recognition that, under DIVCA, additional reports are to be used sparingly and only when “truly necessary” to enforce specific DIVCA provisions.¹⁰ Additional reports are not necessary.

B. Competition – Not Additional Regulatory Burdens – Will Promote Broadband Access

DIVCA is premised on the notion that the best way to promote deployment of new technologies and services is through competition¹¹ – and the best way to allow competition to thrive is to remove entry barriers and eliminate regulatory obligations,¹² not add new ones. The Commission recognized and acted on this principle in establishing the Uniform Regulatory Framework, relying “on competition whenever possible” and on “technologically and competitively neutral measures . . . to encourage the development of new technologies.”¹³ The Federal Communications Commission (FCC) has likewise taken a consistent deregulatory approach to all forms of broadband service in order to encourage investment and deployment of broadband infrastructure.¹⁴ This deregulatory

¹⁰ D.07-03-014 at 152.

¹¹ See, e.g., §5810(a)(1)(B)(“Increased competition in the cable and video service sector . . . speeds the deployment of new communication and broadband technologies. . . .”).

¹² See, e.g., §5810(a)(1)(C)(“To promote competition, the state should establish a state-issued franchise authorization process. . . .”)

¹³ D.06-08-030 at 4-5.

¹⁴ See, e.g., *Inquiry Concerning High-Speed Access to the Internet over Cable and Other Facilities*, Declaratory Ruling and Notice of Proposed Rulemaking, 17 FCC Rcd 4798 (2002)(treating cable modem service as unregulated information service); *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities*, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853, ¶ 44 (2005)(deregulating Bell company internet access services); and *Appropriate Regulatory Treatment for Broadband Access to the Internet over Wireless Networks*, Declaratory Ruling, 22 FCC Rcd 5901 (2007); *United Power Line Council’s Petition for Declaratory Ruling Regarding the Classification of Broadband over*

approach has been extremely successful. Information compiled periodically by the FCC indicates that, as of the end of the first quarter of 2007, approximately 44 percent of all U.S. households subscribe to broadband – up from 22 percent three years ago – and that total is expected to reach approximately 50 percent by the end of 2007.¹⁵ Morgan Stanley estimates that, as of the end of first-quarter 2007, “roughly 70 percent of online households [have signed up for broadband.”¹⁶ Nielsen//NetRatings reports that 80 percent of “active Internet users” already have a broadband connection at home.¹⁷ According to the FCC’s most recent data, the vast majority of consumers in the U.S. have access to *at least* three competitive platforms for broadband, and consumers’ broadband options are quickly increasing.¹⁸ There is no reason to expect that market forces will work any differently in California.

The Commission must also bear in mind that any additional reporting requirements it imposes will reach only those carriers with state video franchises – currently Verizon and AT&T.¹⁹ Reports from only a small number of market

Power Line Internet Access Service As an Information Service, Memorandum Opinion and Order, 21 FCC Rcd 13281 (2006)(broadband over powerline and wireless broadband treated as unregulated information services).

¹⁵ S. Flannery, *et al.*, Morgan Stanley, *Cable & Telecom; As Broadband Matures, Speeds (and CapEx) Rise* at Exh. 21 (Apr. 23, 2007) (1Q07 estimate); R. Bilotti, *et al.*, Morgan Stanley, *Broadband Update: Bundling Is an Arms Race, Not a Price War* at Exh. 7 (July 8, 2004) (1Q04 data).

¹⁶ S. Flannery, *et al.*, Morgan Stanley, *Cable & Telecom; As Broadband Matures, Speeds (and CapEx) Rise* at 1 (Apr. 23, 2007).

¹⁷ See S. Flannery, *et al.*, Morgan Stanley, *Cable & Telecom; As Broadband Matures, Speeds (and CapEx) Rise* at 7 (Apr. 23, 2007).

¹⁸ As of June 2006, consumers in more than 87 percent of U.S. zip codes have 3 or more broadband choices, up from 58 percent in June 2003. Sixty-three percent of U.S. zip codes are served by 5 or more broadband providers, up from 33 percent in June 2003. In one in five zip codes, there are now *10 or more* broadband choices. Ind. Anal. & Tech. Div., Wireline Competition Bureau, FCC, *High-Speed Services for Internet Access: Status As of June 30, 2006* at Table 15 (Jan. 2007).

¹⁹ Cox Communications Inc. filed an application for a state video franchise in the San Diego area on April 11, 2007, but the Commission website does not indicate the disposition of this application. Incumbent cable providers may not come under the state franchise system and its attendant reporting requirements for several years.

participants will do little to address the legislative purpose of determining whether access to video service is “widespread” or investment in broadband infrastructure is increasing. Moreover, continuing to layer more reporting requirements on those few video and broadband providers who seek state franchises contravenes the Legislature’s express intent that DIVCA “[c]reate a fair and level playing field for *all* market competitors that does not disadvantage or advantage on service provider or technology over another.”²⁰ Rather than imposing more regulatory reporting requirements, the Commission should look to market forces and voluntary efforts to promote access and infrastructure development.

One such example is the comprehensive initiative by ConnectKentucky – a private-public alliance of corporations, universities, and government entities seeking to promote broadband – which shows that, even in relatively rural states such as Kentucky, broadband is becoming ubiquitous without government intervention. ConnectKentucky gathered data from all types of broadband providers across the state, and then worked with unserved communities to obtain information about who was interested in broadband services. ConnectKentucky then shared this information with providers who, in some cases, decided to deploy facilities in these communities to meet this demand. In other cases, providers needed additional assistance, so they received assistance from the Appalachian Regional Commission, state sponsors, and various other sources of funding. As a result of these voluntary initiatives, broadband is already available

²⁰ §5810(2)(A)(emphasis added).

to more than 90 percent of households in Kentucky, and by the end of this year that total will reach virtually 100 percent.²¹

In short, the Commission should not look to DIVCA as a tool for imposing further reporting requirements on state franchise holders to address the issues raised in the Scoping Memo.

III. Revisions to State Video Franchise Certificate

Verizon is not aware at this time of any errors or omissions in the adopted video franchise certificate or attachments to D.07-03-014, but will address this issue in reply as needed.

IV. Amendment to Commission Procedural Rules

Verizon is not aware at this time of any additional incompatibilities with, or changes to, Commission rules needed to conform to the requirements of DIVCA, but will address this issue in reply as needed.

V. Renewal of Video Franchises

Verizon concurs that adoption of principles or policies regarding franchise renewal would be premature at this time, as the earliest franchise renewal will occur in 2017.


VI. Conclusion

For the reasons set forth above, Verizon believes that no additional rules are required with respect to the issues identified in the Phase II Scoping Memo. We look forward to addressing these questions further in reply comments.

²¹ ConnectKentucky, *Broadband Adoption and Barriers: Results & Analysis from the ConnectKentucky Technology Assessment Study*, <http://www.connectkentucky.org/NR/rdonlyres/2F6BAAC1-A6D0-4DD7-BEDF-385030488D6C/0/CKdocSRSBroadbandAdoptionBenchmarks.pdf>; ConnectKentucky, 2007 *Progress Report* at 4-5.

Dated: May 31, 2007

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 711 Van Ness Ave., Ste. 300, San Francisco, CA 94102; I have this day served a copy of the foregoing:

**OPENING COMMENTS OF VERIZON ON ISSUES SET FORTH IN PHASE II
SCOPING MEMO DATED MAY 7, 2007**

by electronic mail to those parties on the service list shown below who have supplied an e-mail address, and by U.S. mail to all other parties on the service list.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 31st day of May, 2007, at San Francisco, California.

/s/Sonja Killingsworth
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Service List:
Rulemaking 06-10-005

CALIFORNIA PUBLIC UTILITIES COMMISSION

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